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FEDERAL COMMUNICATIONS COMMISSION  
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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of

Access Charge Reform

Transport Rate Structure and Pricing

End User Common Line Charges

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CC Docket No. 96-262

CC Docket No. 91-213

CC Docket No. 95-72

OPPOSITION TO AND COMMENTS ON  
PETITIONS FOR RECONSIDERATION

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## SUMMARY

The essential thrust of the Access Charge Reform Order with regard to common line cost recovery is the substantial reduction of usage-based charges. AT&T, while not disputing the structural changes, urges the Commission to reconsider its decision by increasing the subscriber line caps on multiline business and non-primary residential lines to recover the full cost of “retail” expenses, including marketing expenses. AT&T requests that the Commission begin implementing the recovery of such expenses through SLC increases immediately.

While BellSouth has no objection to recovery of marketing expenses through SLCs, there are certain adjustments that must be made to the access charge rules before the SLC caps should be increased. As an initial matter, marketing expenses are not just associated with multiline business and non-primary residential lines. These expenses are associated with all lines. Thus, there is no factual basis for limiting recovery of these expenses to only multiline and non-primary residence lines. Additionally, before the SLC caps are increased the Commission must provide for pricing flexibility for SLCs, particularly SLC deaveraging.

Some petitioners express concern regarding the impact of the new PICC charge, particularly on certain multiline business customers. BellSouth supports the concept of PICC charges and believes that they represent a more efficient means than usage based charges for recovering nontraffic sensitive costs. Nonetheless, as implemented by the Access Charge Reform Order, the PICC represents a subsidy mechanism.

Under the current rules, multiline business customers would bear a disproportional share of the implicit subsidy reflected in the PICC. BellSouth believes that a single PICC should apply

to all subscriber lines, regardless of the line's designation as business or residential. A single PICC applicable to all lines would mitigate the impact on multiline business lines.

In addition, several parties challenge the Commission's determination to reallocate all of the tandem costs to the tandem switching element and to eliminate the unitary structure for common transport. None of the arguments presented by the petitioners warrants disturbing the Commission's decision. Virtually all of the arguments made in the petitions were presented, fully considered and rejected by the Commission in the Access Charge Reform proceeding. The petitions offer no basis for the Commission to reconsider its decision.

Although there are a few modifications the Commission should make to its Access Charge Reform Order, the Order improves the access charge rules. The Commission must continue to bring the access charge rules in line with the needs of a competitive marketplace and deny requests that would reinstitute inefficient rules and rate structures.

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
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|                                      | ) |                      |
| End User Common Line Charges         | ) | CC Docket No. 95-72  |

**OPPOSITION TO AND COMMENTS ON  
PETITIONS FOR RECONSIDERATION**

BellSouth Corporation and BellSouth Telecommunications, Inc. ("BellSouth") hereby submit their opposition to and comments on the Petitions For Reconsideration that were filed on July 11, 1997 in the above referenced proceeding.

In its Access Charge Reform Order, the Commission took steps to improve the efficiency of its access charge rules.<sup>1</sup> While clearly there is a distance to go and key changes, such as pricing flexibility, remain to be accomplished, the overall direction reflected in the access charge rule modifications was positive. The Order establishes rate structures more reflective of costs. Significantly, the access charge rules finally shift away from usage-based rate structures in favor of flat rate structures for recovery of costs that do not vary with usage. The two areas most affected by the access rule modifications are common line and tandem switched transport. Not surprisingly, these areas are also the primary focus of the Petitions for Reconsideration. As shown below, the Commission should not substantially alter its decision.

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<sup>1</sup> Access Charge Reform, CC Docket No. 96-262; Price Cap Performance Review for Local Exchange Carriers, CC Docket No. 94-1; Transport Rate Structure, CC Docket No. 91-213; and End User Common Line Charges, CC Docket No. 95-72, First Report and Order, released May 16, 1997 ("Access Charge Reform Order").

**A. The New Rules For Recovery Of Common Line Costs Are A Reasonable Approach To Recovery Of Non-traffic Sensitive Loop Costs**

The essential thrust of the Access Charge Reform Order with regard to common line cost recovery is the substantial reduction of usage-based charges. To accomplish this objective, the Commission has increased the ceiling on multiline and non-primary residential line subscriber line charges. In addition, the Commission established presubscribed interexchange carrier charges (PICCs), flat rate charges that are assessed on interexchange carriers. The new subscriber line caps on non-primary residence lines as well as the PICCs will be implemented January 1, 1998.

AT&T, while not disputing the structural changes, urges the Commission to reconsider its decision by increasing the subscriber line caps to recover the full cost of "retail" expenses and implementing the recovery of "retail" expenses through SLC increases immediately. Among the expenses AT&T classifies as retail expenses are end user marketing expenses, customer service expense, and indirect expenses such as corporate operations, general support expenses and telecommunications uncollectibles. The Commission has already determined that end user marketing expenses should be reflected in multiline business SLCs. Thus, as to this expense, AT&T wants the Commission to advance the date of implementation and to assure that the full expense is recovered from SLCs.<sup>2</sup>

While BellSouth has no objection to recovery of marketing expenses through SLCs, there are certain adjustments that must be made to the access charge rules before the SLC caps should be increased. As an initial matter, marketing expenses are not just associated with multiline business lines and non-primary residential lines. These expenses are associated with all lines. As

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<sup>2</sup> AT&T at 8-10.

USTA points out in its petition, there is no factual basis for limiting recovery of these expenses to only multiline and non-primary residence lines.<sup>3</sup> A portion of these marketing expenses benefit single line residential and business users and hence a portion of these expenses should be recovered from these lines.

Additionally, before the SLC caps are increased the Commission must provide for pricing flexibility for SLCs, particularly SLC deaveraging.<sup>4</sup> Given the competitive environment for local services, as more cost recovery responsibility is shifted to end users, incumbent LECs should be afforded the ability to align their rates in a manner consistent with the cost of serving their customers. In other words, the incumbent LECs require the same ability to establish economically rational prices as their competitors. The constraints imposed by the Commission on incumbents only serve to create non-economic based rivalry and insulate the market from true competition. Thus, an essential prerequisite to increased SLCs is for the Commission to complete expeditiously, the pricing flexibility portion of the access charge reform proceeding.

With regard to AT&T's contention that there are other "retail" expenses in addition to marketing expenses that should be recovered through SLC charges, AT&T fails to conclusively establish a retail nexus. AT&T's referral to the avoidable cost methodology developed by the Commission in the Local Interconnection proceeding<sup>5</sup> (and since vacated) misses the point. All of the expenses cited by AT&T are allocated to the interstate jurisdiction through the separations

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<sup>3</sup> USTA at 7.

<sup>4</sup> BellSouth's baseline reforms include deaveraging the multiline business SLC, PICC and residential MOU deaveraging. Phase 1 reforms call for deaveraging all carrier access charges not previously addressed. See BellSouth Ex Parte, CC Docket No. 96-262, dated July 28, 1997.

<sup>5</sup> Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; Interconnection between Local Exchange Carriers and Commercial Mobile Radio Service Providers, 11 FCC Rcd 15499 (1996) ("Local Interconnection Order").

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process. The separations process, in general, bases its assignments on relative use--and the primary relative use cost driver for incumbent LECs is interstate access. Thus, access usage, to some degree, is responsible for the interstate cost assignment in the first instance. To suggest, as AT&T does, that only end users should bear the cost recovery responsibility is farfetched.

Other petitioners express concern regarding the impact of the new PICC charge, particularly on certain multiline business customers.<sup>6</sup> These petitioners put forward several alternative proposals that would mitigate the impact of the PICC charge on multiline business customers. While BellSouth supports the concept of PICC charges and believes that they represent more efficient means than usage based charges for recovering nontraffic sensitive costs, nonetheless, as implemented by the Access Reform Order, PICCs represent a subsidy mechanism. Multiline business customers are, for the most part, bearing the interstate cost of their lines. Combined with the intrastate rates for their services, multiline business customers provide implicit support to universal service. In the absence of a new federal universal service fund, these multiline users not only will continue to bear their historic support for universal service, but, in addition, through the higher PICCs that will be assessed on multiline business lines, these users will have to shoulder a disproportionate share of the implicit subsidy reflected in the PICC.

Such an impact is of concern to BellSouth. Because of the implicit subsidy that is reflected in the multiline business PICC, BellSouth believes that a single PICC should apply to all subscriber lines, regardless of the line's designation as business or residential. A single PICC applicable to all lines would mitigate the impact on multiline business lines identified in the petitions. Accordingly, a single PICC would be competitively neutral, a characteristic not

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<sup>6</sup> Telecommunications Resellers at 6-12, Comptel at 2-6, ACTA at 2-9.



associated with the current rules.<sup>7</sup> Further, a single PICC avoids the churn and disruption that is caused under the current approach.<sup>8</sup> The benefits of a single PICC, therefore, merit a modification of the Commission's rules.

**B. The Three Part Structure For Tandem Switched Transport Is Appropriate**

Several parties challenge the Commission's determinations to reallocate all of the tandem costs to the tandem switching element and to eliminate the unitary structure for common transport. None of the arguments presented by the petitioners warrants disturbing the Commission's decision. Virtually all of the arguments made in the petitions were presented, fully considered and rejected by the Commission in the Access Charge Reform proceeding. The petitions offer no basis for the Commission to reconsider its decision.

WorldCom objects to the reallocation of the tandem revenue requirement to the tandem switching element. WorldCom argues that such reallocation unjustifiably allocates greater overheads to tandem switching than to other access elements and that the reallocation is

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<sup>7</sup> In keeping with the goal of competitive neutrality, BellSouth supports the petitions of several parties that urge PICCs be applied to Centrex lines on a PBX-trunk equivalent basis. Los Angeles County at 10 and ICA at 2-4.

<sup>8</sup> Under the current rules, multiline business lines start off with higher PICCs than other lines. As the PICCs for other classes of service increase, the PICCs associated with multiline business lines would decrease. Eventually, the PICCs would be equalized. The churn embedded in the current multi-level PICC approach contributes to the distortions discussed in the petitions. Adopting a single PICC, even if implemented on a phased approach beginning with the same level as is currently scheduled for residence lines (\$.53), the yo-yo effect of the current rules would be mitigated as would the severe initial impact on multiline business lines. BellSouth estimates that on an industry wide basis a single PICC would be:

| <u>1/1/98</u> | <u>7/1/98</u> | <u>7/99</u> | <u>7/00</u> | <u>7/01</u> |
|---------------|---------------|-------------|-------------|-------------|
| \$ 1.11       | 1.10          | 1.54        | 1.64        | 1.41        |

inconsistent with Price Cap policies. With regard to WorldCom's overhead argument, it is merely a repeat of the same arguments that were presented to the Commission in the Access Charge Reform Proceeding. The Commission found that it was reasonable to set overhead loadings for tandem switching in a manner consistent with overhead loadings for local switching.<sup>9</sup> The Commission based its finding on the fact that direct costs of both kinds of switching are fundamentally the same. This is not the case between the direct costs of tandem switching and transmission. Accordingly, the Commission correctly determined that a consistent overhead loading methodology across switching functions distinct from transmission functions establishes a reasonable cross-over for access customers between direct-trunked transport and tandem-switched transport. Nothing in WorldCom's petition disturbs the Commission's findings.

No more compelling is WorldCom's argument regarding the reallocation of the tandem switched revenue requirement to tandem switching. WorldCom's claim that the reallocation is inconsistent with the Price Cap rules completely overlooks the fact that every price cap category index was initialized on the basis of prices that were based upon revenue requirements. In transferring the tandem revenue requirement to the tandem switching category, the Commission is acting consistently with the way in which all other price cap indices have been established. Further, recognizing that price cap regulation has been in place, the Commission provided for adjusting the tandem revenue requirement that is to be reassigned in order to flow-through the benefit of past X-factor reductions. Accordingly, there is nothing in the reassignment of the tandem switched revenue requirements that is inconsistent with price cap rules.

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<sup>9</sup> *Access Charge Reform Order* at ¶ 203.

Several petitioners seeking to have the unitary common transport rate structure reinstated argue that the partitioned structure is unfair.<sup>10</sup> They contend that common transport users must pay mileage based on actual routing because distance sensitive charges apply between the serving wire center and the tandem office and between the tandem and the end office. In contrast to what these petitioners describe as “actual” tandem routing, they claim that dedicated users only are assessed distance sensitive charges on the basis of airline mileage between the serving wire center and the end office.

Tandem switched transport users are charged no differently than dedicated users. A tandem switched transport user requires a transmission path from the serving wire center to the tandem office. The transmission path is dedicated to the tandem switched transport user. It is appropriate to recover the distance sensitive cost of this transmission path from the cost causer, the tandem switched transport user. Similarly, the tandem user requires distinct transmission paths between the tandem and the end office and should, as a cost causer, bear a reasonable proportion of these distance sensitive costs. For both transmission paths, the distance component of the charge is based on airline mileage, not the physical route of the facilities involved.

This method of charging for tandem switched transport is no different than that used for comparable dedicated transport. Thus, when dedicated transport is ordered to a hub office and, then, from the hub office to end offices, there are two distinct mileage calculations. The first mileage calculation is the airline mileage between the serving wire center and the hub office. The second mileage calculation is between the hub office and the end office. Hence, the partitioned rate structure for tandem switched transport is neither unfair nor discriminatory. For tandem

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<sup>10</sup> Comptel at 18-23; WorldCom at 10, U.S. Long Distance, Inc. at 2-3, Frontier at 3-8.

switched transport and dedicated switched transport, customers pay distance-related charges for the specific services they order and that the LEC is obligated to provide.

Equally unavailing is the argument of some petitioners that the partitioned rate structure would lead to inefficient deployment of facilities.<sup>11</sup> These petitioners set forth improbable hypothetical situations wherein LECs are relocating tandem offices or adding tandem offices to maximize distance-related charges and revenues. These bald assertions defy sound engineering economics and practices. There is substantial investment associated with tandem offices as well as with the trunking facilities connecting the tandem office with other central offices. The existing tandem arrangements cannot be rearranged and rerouted willy-nilly without the LEC incurring substantial costs. Maximizing the distance-related charges of tandem switched transport users would never justify or compensate the LEC for the type of behavior hypothesized by the petitioners.

In the Access Charge Reform proceeding, parties similarly argued that tandem switched users should not pay mileage charges because the LEC, not the customer, selects the location of the tandem. The Commission rejected this argument, recognizing that LECs also select the location of serving wire centers and end offices between which distance-sensitive charges apply for dedicated transport and have applied under the unitary structure.<sup>12</sup> The Commission found no basis to relieve tandem switched transport users from the responsibility of paying for the costs

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<sup>11</sup> See e.g., WorldCom at 15.

<sup>12</sup> Access Charge Reform Order at 187.

they cause because they require LECs to transport their traffic to tandems.<sup>13</sup> Nothing in the petitions warrants a reversal of this determination.

WorldCom also seeks reconsideration of the establishment of multiplexing charges for tandem switched transport.<sup>14</sup> WorldCom complains that it should not be charged for DS3 to DS1 multiplexing or DS1 to voice grade multiplexing unless similar charges are imposed upon the dedicated transport user. Dedicated transport users are assessed multiplexing charges where multiplexing is required to provide the service requested by the customer. Thus, for instance, if a dedicated user obtains DS3 dedicated switched transport to an end office, the DS3 will have to be multiplexed down to a DS1 level to connect to the trunk-side of a digital switch, and further multiplexed down to a voice grade level to connect to the trunk-side of an analog switch. The dedicated switched transport customer would, in that situation, be assessed a multiplexing charge. Likewise, if the dedicated switched transport user orders dedicated switched transport to a hub and wants to fan out that transport from the hub to several end offices, multiplexing charges would apply.<sup>15</sup>

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<sup>13</sup> *Id.* Petitioners also make the point that ring architecture is making the cost structure of LEC networks less distance sensitive. *See e.g.*, WorldCom at 12-13, Comptel at 19. In the first instance, the network architectures referred to by the Petitioners are not ubiquitously deployed. Thus, the rate structure that averages the combinations of network architectures that are present is reasonable. Further, even ring architectures have some distance sensitivity. Thus, a rate structure that permits LECs to recognize this cost characteristic, as the Commission's permanent transport rules do, is cost-based. Finally, the petitioners' arguments are makeweight. Petitioners do not dispute a distance-sensitive rate structure. They accept the validity of a distance-sensitive unitary structure. It is only under the partitioned structure that the distance-sensitivity of the network architecture is called into question. Thus, petitioners argument is little more than a variation on the single theme that the partitioned structure is unfair to them. As discussed above, the partitioned structure for tandem switched transport is neither unfair nor discriminatory.

<sup>14</sup> WorldCom at 18.

<sup>15</sup> The charges that would apply would depend on whether a DS3 circuit is being multiplexed to a DS1 level or a DS1 circuit is being multiplexed to a DS0 level.

The multiplexing charges that will be associated with tandem switched transport under the permanent transport structure recover the costs of multiplexing necessary to provide the service that the customer has ordered. Thus, the basis for assessing multiplexing charges on tandem switched transport users is no different than that of dedicated switched transport users. Notwithstanding WorldCom's preference that it not pay any multiplexing charges, there is no credible reason to excuse tandem switched transport users from bearing the costs of the service they request.

Several parties urge the Commission to reconsider its determination that LECs should use actual common transport usage in rate setting. These parties suggest that the Commission, instead, should reinstate the assumed 9000 minute circuit loading for common transport.<sup>16</sup> They argue that use of actual common transport minutes ignores the fact that common transport facilities carry more than just access traffic and that the use of actual common transport minutes will lead to LEC's inefficiently adding common transport facilities.

These arguments are fundamentally flawed. In the first instance, only interstate costs are recovered through interstate access charges. Thus, the fact that intrastate traffic is carried on the network that LECs use to provide interstate common transport is irrelevant to interstate rate setting since the jurisdictional separations process establishes the interstate cost responsibility. More importantly, for price cap carriers, such as BellSouth, the Commission's price cap rules further constrain BellSouth's prices. To suggest, as WorldCom does, that LECs will add circuits inefficiently overlooks the fact that such cost additions are not recognized under the

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<sup>16</sup> Comptel at 23-24, Sprint at 8, WorldCom at 8.

Commission's price cap rules and, hence, do not raise the price cap which limits the price that can be set for common transport.

Finally, several parties request that the Commission require LECs to waive nonrecurring charges if the interexchange carrier decides to relocate their points of presence (POP) to LEC tandems.<sup>17</sup> While the Commission provided for a limited waiver of nonrecurring charges associated with an IXC replacing tandem switched transport with dedicated switched transport, the purpose of the nonrecurring charge waiver was to enable IXCs to optimize their selection of transport services offered by the LEC. Such a waiver is not intended, nor should it be used, for the purpose of subsidizing the wholesale reconfiguration of the IXCs' networks. Yet, waiving nonrecurring charges when an IXC relocates its POP would be nothing less than such a subsidy. Accordingly, the Commission should reject these parties request.

### **C. Other Issues**

A few parties object to the Commission's determination to permit LECs to establish call setup charges to recover the cost of SS7 signaling that is being reallocated from the TIC. While some believe the Commission should not permit any call setup charges,<sup>18</sup> others want an extended transition period before such setup charges are permitted.<sup>19</sup>

The record adequately supports the Commission's determination that a call setup charge is reasonable. Among the steps the Commission took to make the access rules more cost based is to reallocate from the transport interconnection charge those costs that can specifically be associated

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<sup>17</sup> WorldCom at 20, 21.

<sup>18</sup> WorldCom at 21-22.

<sup>19</sup> Compuserve.

with other access elements. Among the services affected by this reallocation is SS7 signaling. In recognition of this reallocation, the Commission provided a recovery mechanism by permitting LECs to establish a call setup charge.

Nothing in the petitions provides a basis for the Commission to reconsider its decision. For example, WorldCom's reference to "bill and keep" compensation mechanisms for carrier interconnection is inapplicable to interstate access service. "Bill and keep" is an acceptable compensation mechanism for transport and termination of local traffic pursuant to local interconnection arrangements. The Commission, in its *Local Interconnection Order*, recognized the difference between local interconnection and the provision of access services by local carriers to IXC. LECs are providing a service to the IXC that includes call setup and it is wholly appropriate for the LEC to be compensated for the service it provides.

Equally unavailing is the argument that LECs are double recovering these SS7 costs because they have local intrastate services which also use SS7 facilities and for which intrastate rates apply. This argument simply ignores jurisdictional separations and the fact that the costs that call setup charges would recover are interstate costs that are not and cannot be recovered through intrastate charges.

Nor is it appropriate for the Commission to delay the time in which LECs may introduce a call setup charge. Effectively, interstate customers have had the benefit of a transition period since the interim transport rate structure went into effect four years ago. In its *Access Charge Reform Order*, the Commission provided an additional 12 month transition period, until July 1998. There is simply no basis to extend this transition period further.



In its Petition, Sprint requests that the Commission establish a requirement that LECs provide IXC's data that would enable them to verify the type of lines (*i.e.*, residence, multiline business) for which PICCs are being assessed.<sup>20</sup> As stated above, BellSouth believes that a single PICC should apply to all subscriber lines. The adoption of a single PICC would eliminate the need for reports.<sup>21</sup>

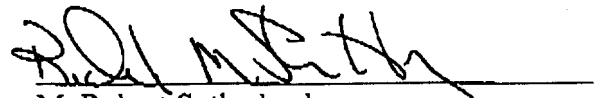
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Although there are a few modifications the Commission should make to its *Access Charge Reform Order*, the *Order* improves the access charge rules. The Commission must continue to bring the access charge rules in line with the needs of a competitive marketplace and deny requests that would reinstitute inefficient rules and rate structures.

Respectfully submitted,

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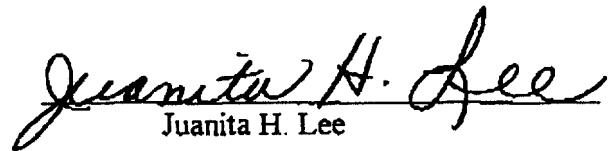
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<sup>20</sup> Sprint at 3.

<sup>21</sup> Furthermore, it would be premature for the Commission to institute such a reporting requirement. The Ordering and Billing Forum is currently considering the billing standard for PICCs. The Commission ought to permit this industry forum to complete its efforts which will likely mitigate, if not completely alleviate, Sprint's concerns.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 18th day of August, 1997 served all parties to this action with a copy of the foregoing **OPPOSITION TO AND COMMENTS ON PETITIONS FOR RECONSIDERATION** by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties listed on the attached service list.

  
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